

**PLAINTIFF'S RESPONSE TO DEFENDANTS'
EMERGENCY MOTION TO STAY DISCOVERY**

EXHIBIT A



STATE & FEDERAL
COURT PRACTICE

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VIA FACSMILE 214/939-2090 &
CERTIFIED MAIL 70112970000203495992

January 4, 2017

Timothy A Daniels
Figari Davenport, LLP
901 Main Street, Suite 3400
Dallas, TX 75202-3776

***Re: Dimas Rodriguez v. Shan Namkeen, Inc., Shailesh Patel, Manisha Patel,
and Shirish Patel -- Cause 3:15-cv-3370-BK***

Counsel:

Enclosed please find Plaintiff's Second Request for Production to Defendant Shailesh Patel.

Respectfully,
JH ZIDELL, P.C.

Rosa Nichols
Legal Assistant

/rn

Enclosures

5. Any and all corporate books and records of the S2 Brothers, LLC and any and all Articles of Incorporation, Certificate of Incorporation, annual report forms and/or assumed name filings made by or on behalf of S2 Brothers, LLC.
6. Any and all wage claims and/or wage-hour complaints filed by any of S2 Brothers, LLC's former or current employees for alleged violations of the federal and/or state wage-hour statutes.
7. Any and all time cards, time and attendance sheets and other documents which indicate or reflect the identities of current or former employees of S2 Brothers, LLC.
8. Any and all documents received from the Texas Department of Labor, Fair Labor Standards Division, regarding that agency's investigation and/or audit of the S2 Brothers, LLC's wage-hour practices during the relevant time period.
9. Any and all documents received from the United States Department of Labor, Wage-Hour Division, regarding that agency's investigation and/or audit of the S2 Brothers, LLC's wage-hour practices during the relevant time period.
10. All videotapes, security logs, and any other documents associated with any security systems at S2 Brothers, LLC's facilities for the years 2010, 2011, 2012, 2013, 2014, and 2015.

Respectfully submitted,


By: /s/ Robert L. Manteuffel

Robert L. Manteuffel

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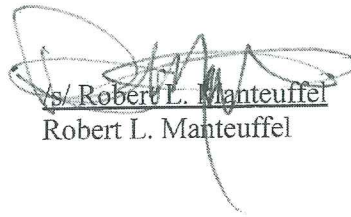
Tel: 972-233-2264

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Certificate of Service

I hereby certify that a true and correct copy of the foregoing instrument was served via facsimile and certified mail or first class mail, on this the 4th day of January, 2017 upon the below listed counsel of record:

Ryan K. McComber
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/s/ Robert L. Manteuffel
Robert L. Manteuffel